



Celbridge Community Council  
The Mill Celbridge Community Centre  
English Row  
Celbridge  
Co. Kildare  
W23 P6P5

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Senior Executive Officer  
Planning Department  
Kildare County Council  
Áras Chill Dara  
Naas  
Co. Kildare

## **Public Consultation on Variation 1 to Kildare County Development Plan 2017-2023**

### **Introduction**

Celbridge Community Council welcomes the opportunity to make a submission on *Proposed Variation 1 to Kildare County Development Plan 2017 - 2023*.

Celbridge Community Council supports many aspects of the *National Planning Framework* and *Regional Spatial and Economic Strategy* that the proposed variation seeks to incorporate into the County Development Plan. Celbridge Community Council in its desire to see Celbridge develop in a positive and sustainable manner feels that investment in physical and social infrastructure including (but not limited to) the following is essential:

- enhanced public transport provision to reduce the level of car dependency - Celbridge requires frequent, express public transport services to Dublin city centre and connectivity to many settlements, industrial areas, retail areas and recreational facilities in West Dublin and North Kildare
- a second Liffey crossing and orbital route around the town to remove as much traffic from the town centre as possible enabling freer flow of pedestrian, cycling and bus movements in the town centre and across the existing heritage stone bridge which has for so long served as a bottleneck
- prioritisation of safe cycling and pedestrian routes to incentivise active modes of transport from a young age - destinations like schools, retail areas, sports facilities and recreational facilities in our town and adjoining areas need to be easily and safely accessible for all ages and abilities
- facilities for performing arts, sports & recreation locally to address different interests - this will reduce the need for car journeys out of town
- provision of local childcare facilities, schools, medical practices, etc. in a proactively planned manner will reduce the need for families to make car journeys to access such services
- space must be allocated for local employment growth to facilitate re-balancing the employment to population ratio
- etc.



Celbridge Community Council welcomes the following

- **Proposed Amendment # 2 - In 1.4.1 (National Policies and Strategies) & Proposed Amendment #8 - in Table 2.3 (Population Projections to 2031)** - the contraction in the extent of population growth being directed to Co. Kildare relative to other places in the country (253,600 by 2023 to 249,000-254,000 by 2026)
  - **Note:** the same table is replicated in both places
- **Proposed Amendment # 4** - the addition of the new **Section 1.4.3 (iii) (Climate Resilient Kildare: Kildare County Council Climate Change Adaption Strategy 2019 – 2024)**
- **Proposed Amendment # 5** - the addition of the words “with a focus on urban regeneration and compact growth” in **Section 2.2 (ii)**
- **Proposed Amendment # 7** - in **Section 2.7 (Preferred Development Strategy)** - addition of “Measured growth with emphasis on economic growth in the towns identified as Self-Sustaining Growth Towns and Self-Sustaining Towns as per Table 2.2”
- **Proposed Amendment # 10** - in **Section 2.16.2 (Policies: Economic Development)** - the changed wording of policies
  - **CS 7** relating to promotion of targeted ‘catch up’ investment places that have experienced rapid commuter driven population growth and
  - **CS 8** relating to the reversal of commuting patterns
- **Proposed Amendment # 14** - the introduction of the requirement that land use plans will need to include a detailed Infrastructural Assessment” in **Section 3.6 (Development Capacity)**
- **Proposed Amendment # 15** - the introduction of objective SO 11 requiring that an Infrastructural Assessment be prepared for local area plans in **Section 3.9 (Objectives: Settlement Strategy)**

## Designations of Settlements

The EMRA RSES outlines the Settlement Hierarchy for the Eastern & Midlands region designating Naas and Maynooth as “Key Towns” in County Kildare but leaving it to development plans to designate all levels in the hierarchy below “Key Town”. To guide local authorities, the RSES provides a description of what types of settlements might be designated “Self-Sustaining Growth Towns”, “Self-Sustaining Towns”, “Towns and Villages” or “Rural”. The proposed variation 1 to the CDP, suggests designating Celbridge as a “Self-Sustaining Town”.<sup>1</sup>

Based on the descriptions from the EMRA RSES, the “Self-Sustaining Town” designation appears most fitting **provided it is supported by investment to enable rebalancing**. The ratio of jobs to resident workforce is low in Celbridge and the town desperately needs redoubling of efforts towards more sustainable, balanced growth that redresses deficits in both physical and social infrastructure.

However, there is an obvious issue with the **designation of Celbridge on the Settlement Hierarchy** in that the designation contradicts the population targets for Celbridge. **Section 2.11.4** refers to “contained growth” but, at

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<sup>1</sup> From EMRA RSES - “**Self-Sustaining Towns** are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. A number of settlements within the Metropolitan Area, Core and at the eastern fringes of the Gateway Regions have undergone rapid commuter-focused residential expansion over the recent decade, without equivalent increases in jobs (i.e. settlements characterised by a low ratio of jobs to resident workforce) and services. Population growth in these towns shall be at a rate that seeks to achieve a balancing effect and shall be focused on consolidation and inclusion of policies in relation to improvements in services and employment provision, to be set out in the core strategies of county development plans.”



10%, the share of the population targets for Co. Kildare that Celbridge is expected to absorb remains only marginally behind the percentages that our neighbouring towns of Leixlip and Maynooth are expected to absorb - 10.2% and 10.9% respectively. Based on their designations, Leixlip and Maynooth should be absorbing significantly more residential growth but this plan, by setting such a marginal percentage difference, appears to be trying to pay lip service to the policy to “direct growth into the Key Towns, followed by the Self-Sustaining Growth Towns and the Self-Sustaining Towns...” (SS 2).

There is a real danger of significant car dependant development in Celbridge before the publication of a new Local Area Plan so the framework for sustainable development needs to be very tight.

- An Bord Pleanala approved a Strategic Housing Development application for 251 dwellings in the Oldtown KDA,
- A new Strategic Housing Development application for 372 dwellings in the Crodaun KDA was recently lodged with An Bord Pleanala (Case # 306504)
- Another developer has been involved in pre-application consultations with An Bord Pleanala for 495 dwellings at another site in the Crodaun KDA (Case # 304246) across the road from the first one.

These developments alone would generate in excess of 1,000 units but these two KDAs are the least strategically positioned of the KDAs in Celbridge with respect to accessing the train at Hazelhatch.

An alternative to consider is that the variation designates Celbridge as a “Self-Sustaining Growth Town” but this designation does not appear to fit our town as well.<sup>2</sup>

Celbridge Community Council agrees that “Self-Sustaining Town” is an appropriate designation in the Settlement Hierarchy for Celbridge ***provided such designation has no bearing on a town’s ability to attract investment for physical and social infrastructure*** (both to catch-up on infrastructural deficits and to future-proof the town in ways listed in our introduction). However, if the designation in the Settlement Hierarchy has a significant bearing on a town’s ability to attract investment and Celbridge must continue to carry significantly above its weight in terms of absorbing residential growth, then it may be better to designate Celbridge as a “Self-Sustaining Growth Town”. Celbridge Community Council would only agree with the designation as “Self-Sustaining Growth Town” if such designation is essential for attracting the necessary investment.

Celbridge Community Council acknowledges that this public consultation only relates to a variation to the County Development Plan and does not constitute a full County Development Plan review. However, Celbridge Community Council wishes to draw Kildare County Council’s attention to how the **Core Strategy** and **Settlement and Housing Strategy** chapters in the [Draft Meath County Development Plan 2020-2026](#) describe Meath County Council’s vision for settlements designated as “Self-Sustaining Growth Town” and “Self-Sustaining Town”. The [Core Strategy](#) and [Settlement and Housing Strategy](#) chapters therein use very clear language to express Meath County Council’s intentions with respect to the towns designated as Self-Sustaining Growth Towns versus Self-Sustaining Towns. Celbridge Community Council acknowledged that none of the settlements identified by Meath County Council as a “Self-Sustaining Town” is within the boundaries of the Dublin MASP and accordingly they are not directly comparable with Celbridge (which is in a unique position due to its sheer size).

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<sup>2</sup> From EMRA RSES - “**Self-Sustaining Growth Towns** are towns that contain a reasonable level of jobs and services which adequately caters for the people of its service catchment. This may include sub-county market towns and commuter towns with good transport links, which have capacity for continued commensurate growth. Towns in the Dublin Metropolitan Area and Core Region tend to have experienced strong commuter focussed growth but some of these towns offer potential for increased residential densities at high quality public transport hubs and can accommodate average or above average growth to provide for natural increase, service and/or employment growth where appropriate, to be set out in the core strategies of county development plans.”



## Strategy for the Dublin MASP Area in North-East Kildare

The designation of Maynooth as a “Key Town” provides clarity and opportunity for North-East Kildare, an area where the unique proximity of the large highly urbanised settlements of Maynooth, Leixlip and Celbridge has perhaps detracted from a coherent strategy for the area as a whole in the past. The North-East Kildare settlements within the Dublin MASP have indisputably strong connections with Dublin City and County but the new spatial and economic strategy presents real opportunity for more sustainable development in the area and for fostering stronger connections between the neighbouring settlements.

The [EMRA RSES](#) outlines indicative opportunities for employment development in Maynooth<sup>3</sup> and includes a policy objective to “Support Maynooth as a key town to act as an economic driver for north Kildare and provide for strategic employment at key locations to improve the economic base of the town and provide for an increased number of local jobs.” (**RPO 4.34**). The County Development Plan has a concept of Economic Clusters (outlined in **Section 2.11.2**) but the proposed variation to the County Development Plan fails to enunciate a strategy for developing both individually sustainable towns and a broadly sustainable North-East Kildare area with strong connections between all settlements therein.

Since a review of the Maynooth Local Area Plan is pending and will likely predate a full review of the County Development Plan, it is important that the varied County Development Plan provides a robust framework for how Maynooth as a “Key Town” will influence, support and become the economic driver for north-east Kildare in a manner that is positive and sustainable for residents across all settlements. The interests of residents and employers in all of the settlements in North-East Kildare need to feed into decisions relating to Maynooth. Consideration needs to be given to a range of matters such as a safe cycling route from Celbridge to Maynooth, how public transport users from Celbridge might access a swimming pool in Maynooth, what measures can be taken to ensure there is demand for two-way commuting flows in and out of Maynooth to neighbouring settlements, how amenities can be provided at locations that are most readily accessible by the greatest number of residents in the area, etc. A transport strategy for the whole area is needed and not just a transport strategy for Maynooth in isolation.

## Celbridge Community Council suggestions

Celbridge Community Council suggests that Kildare County Council edits proposed amendments as follows:

- **Proposed Amendment # 5 - Section 2.2** - Ensure that the economic strategies for “Self-Sustaining Growth Towns”, “Self-Sustaining Towns” and the Dublin MASP settlements are clearly stated including:
  - Clarification of whether “Achieving economies of scale for services and infrastructure in identified **growth** towns” in (iv) includes or excludes “Self-Sustaining Towns”.
  - Elaboration on how the unique proximity of the highly urbanised settlements in the Dublin MASP area will be leveraged to strengthen connections between the settlements and support local sustainability in the area as a whole
  - Addition of something to the list regarding a focus on delivering economic development in a manner that supports sustainable live-work communities - there needs to be a focus on encouraging communities where employment, residency and sustainable transport facilities are located in close proximity to each other in order to reduce long distance commuter trends and

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<sup>3</sup> p.75 of RSES states “There are significant opportunities to further develop knowledge-based employment focusing on ICT and manufacturing through the development of a research and technology campus to the west of the existing university campus. The further development of Maynooth University as a leading third level research and educational facility is critical for the economic development of the town and the region with potential synergies to large established employers such as Intel and Hewlett Packard. Lands at Moygaddy within the Maynooth Environs of County Meath have also been identified for Science and Technology based employment.”



congestion. This should include listing the locally strategic employment sites and not just the regional “Strategic Employment Development Areas” outlined in the Dublin MASP - the proposed replacement of the words “*economic clusters*” with “*Strategic Employment Development Areas in the North-West corridor of the Metropolitan Area, in line with the overall Growth Strategy*” in (v) loses something important that is not otherwise accounted for.

- **Proposed Amendments # 5 to # 10** Outline more clearly in the **Core Strategy** how to achieve balanced residential development through the provision of employment opportunities and the necessary physical and social infrastructure across the Dublin MASP area of our county thereby protecting towns like Celbridge and Kilcock from developing as hollowed out dormitory towns overshadowed by prioritisation of infrastructural provision in Maynooth. The strategy should list desired outcomes, including key indicators of success for each type of settlement. It is important to be clear on this so we have something concrete to build upon in the forthcoming full review of the Country Development Plan.
- Analyse the designation of Celbridge as a “Self-Sustaining Town” and
  - if it is deemed to be the correct designation, examine **Proposed Amendment # 13 - Table 3.3 (Settlement Hierarchy – Population and Housing Unit Allocation 2016 - 2023)** with a view to revising appropriately to reflect more limited residential growth
  - if a “Self-Sustaining Growth Town” is felt to be more appropriate, make the necessary edits e.g. to **Proposed Amendment # 6 - Table 2.2 (Settlement Hierarchy County Kildare)**, etc.
- **Proposed Amendment # 9**
  - Outline more clearly in **Sections 2.11.3** and **2.11.4** what Kildare County Council’s vision is for “Self-Sustaining Growth Towns” and “Self-Sustaining Towns”. Such clarity would provide essential guidance for sustainable development of our town. Reference the [Draft Meath County Development Plan 2020-2026](#) for ideas.
  - Correct the clerical error in **Section 2.11.4 (Self-Sustaining Town)** which describes Self-Sustaining towns as settlements “with high levels of **employment** growth and a weak employment base” - this should state “with high levels of **population** growth and a weak employment base” in accordance with the RSES.
- **Proposed Amendment # 13 - Table 3.3 (Settlement Hierarchy – Population and Housing Unit Allocation 2016 - 2023)** - Check/ correct the values in the **2023 Dwellings Forecast** and **NPF 2026 Pop Growth** columns - even if the percentage for Celbridge remains at 10%, the values in these columns are old values/ too high (we cannot speak to values for towns other than Celbridge but they should also be checked).
- **Proposed Amendment # 16 - Table 5.2 (Economic Development Hierarchy)** - Expand the “Sectoral Opportunities” identified for “Self-Sustaining Towns” as the current list appears overly restrictive - this table could be revised to say a lot more!
- **Proposed Amendment # 16 - Table 5.2 (Economic Development Hierarchy)** - Move Monasterevin up to the “Self-Sustaining Towns”.

We trust that the points raised by Celbridge Community Council will be taken into consideration in your final version of the Variation to the County Development Plan 2017-2023.

Yours faithfully

Liam O’Dwyer  
Secretary  
Celbridge Community Council